

# ***EXHIBIT J***

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

## UNITED WHOLESALE MORTGAGE, LLC,

Plaintiff  
vs.

Case No. 2:22-cv-10395  
Hon. Laurie Jill Michelson

KEVRON INVESTMENTS, INC.,  
Defendant

**DEFENDANT KEVRON INVESTMENTS, INC.'S RESPONSES TO  
PLAINTIFF'S SECOND REQUESTS FOR PRODUCTION**

14. All documents, including without limitation emails or electronic messages, relating to Kevron's renewal of the Wholesale Broker Agreement.

*Objection* Defendant objects to this request because it is overbroad and unduly burdensome. Defendant also objects to this request to the extent it is not relevant to any claims and defenses and not proportional to the needs of the case.

*Response* See attached.

15. All documents, including without limitation emails or electronic messages, relating to any individual Kevron employee's or contractor's ability or

permission to access Kevron's Pipeline account with UWM from March 4, 2021 through February 15, 2022, including individuals with access to UWM-Pipeline username kr@westlakemtg.com.

*Objection* Defendant objects to this request because it is overbroad and unduly burdensome. Defendant also objects to this request to the extent it is not relevant to any claims and defenses and not proportional to the needs of the case.

*Response* Kevron does not have any responsive documents in its possession.

16. All records identifying when Kevron employee's or contractor's accessed or logged in to the UWM-Pipeline from March 4, 2021 through February 15, 2022, including the names and user logins that were used to access the UWM-Pipeline.

*Objection* Defendant objects to this request because it is overbroad and unduly burdensome. Defendant also objects to this request to the extent it is not relevant to any claims and defenses and not proportional to the needs of the case.

*Response* Kevron does not have any responsive documents in its possession.

WILSON ELSER MOSKOWITZ  
EDELMAN & DICKER LLP

By: /s/ Matthew J. High

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PROOF OF SERVICE

The undersigned certifies that on May 12, 2023,  
she served a copy of the foregoing document upon all counsel of record, via:

- First Class Mail  Hand Delivery  
 Facsimile  Overnight Courier  
 Email  MiFile EService

/s/ Tricia C. Waynick  
Tricia C. Waynick

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**From:** UWM Renewals <[uwmrenewals@uwm.com](mailto:uwmrenewals@uwm.com)>  
**Sent:** Monday, November 8, 2021 7:16 AM  
**To:** Kevin Rhatigan <[kr@westlakemtg.com](mailto:kr@westlakemtg.com)>  
**Subject:** RE: [EXTERNAL] RE: RE: UWM Renewal Application SUBMITTED - CA5207 [ ref:\_00D60Jpqk.\_5007V1uyAtl:ref ]

Hello,

Thank you for promptly sending the requested documents. We have been able to finish processing your renewal and you have been approved. Congratulations!

We really appreciate your business and enjoy working with you to help make dreams come true. We look forward to our continued relationship and success.

If you have any questions or need further assistance, please feel free to contact us.

Thank you for partnering with UWM.

----- Original Message -----



**UWM RENEWALS**

[uwm.com](http://uwm.com)

**YOUNITED TO MAKE LENDING EASY**

We are passionate about great service. Please [share your feedback](#) on what we're doing well and where we can improve.

The contents of this message may be confidential. If you are not the intended recipient, do not disseminate, disclose, copy or use this message without the permission of the author. Nothing contained in this message or in any attachment shall satisfy the requirements for a writing, and nothing contained herein shall constitute a contract or electronic signature. If this message has been received in error, please delete it immediately.

**From:** Kevin Rhatigan [kr@westlakemtg.com]

**Sent:** 11/5/2021 3:48 PM

**To:** [uwmrenewals@uwm.com](mailto:uwmrenewals@uwm.com)

**Subject:** [EXTERNAL] RE: RE: UWM Renewal Application SUBMITTED - CA5207 [ ref:\_00D60Jpqk.\_5007V1uyAtl:ref ]

**This Message originated outside your organization.**

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The loan payable to Kevin Rhatigan is a result of me personally loaning the company money dating back to 2008 (the crash). It has been sitting on my books ever since then.

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**From:** UWM Renewals <[uwmrenewals@uwm.com](mailto:uwmrenewals@uwm.com)>

**Sent:** Friday, November 5, 2021 7:20 AM

**To:** Kevin Rhatigan <[kr@westlakemtg.com](mailto:kr@westlakemtg.com)>

**Subject:** FW: RE: UWM Renewal Application SUBMITTED - CA5207 [ ref:\_00D60Jpqk.\_5007V1uyAtl:ref ]

Hello team,

Following up on our conversation on the phone, here is the email regarding what's needed to finish the renewal.

Thank you and have a great day!

----- Forwarded Message -----



**UWM RENEWALS**

uwm.com

**YOU NITED TO MAKE LENDING EASY**

We are passionate about great service. Please share your feedback on what we're doing well and where we can improve.

The contents of this message may be confidential. If you are not the intended recipient, do not disseminate, disclose, copy or use this message without the permission of the author. Nothing contained in this message or in any attachment shall satisfy the requirements for a writing, and nothing contained herein shall constitute a contract or electronic signature. If this message has been received in error, please delete it immediately.

**From:** UWM Renewals [uwmrenewals@uwm.com]

**Sent:** 10/21/2021 1:49 PM

**To:** [register@uwm.com](mailto:register@uwm.com)

**Subject:** RE: UWM Renewal Application SUBMITTED - CA5207 [ ref:\_00D60Jpqk.\_5007V1uyAtl:ref ]

Hello,

You are one step closer to fully renewing your account with UWM! We just need a few more items and we will be all set. Please read on for the required items and send them over by replying to this email. It's that simple!

**Financials LOE:** Please provide a Letter of Explanation regarding the liabilities on your balance sheet submission that clarifies whether the loan belongs to the company or is a personal loan. This required supplemental document provides us with proper understanding of your circumstances as we process the net worth of the company.

We appreciate your prompt attention to this matter. If you have any questions or need further assistance, please feel free to contact us at ext. 61750.

Thank you for partnering with UWM.

----- Original Message -----

**From:** Register [register@uwm.com]

**Sent:** 10/20/2021 2:16 PM

**To:** [uwmrenewals@uwm.com](mailto:uwmrenewals@uwm.com)

**Subject:** UWM Renewal Application SUBMITTED - CA5207

**The following Renewal Application has been SUBMITTED. Company Name: Westlake Mortgage Group Submitted Person Name: Kevin Kevin Submission Date & Time: 10/20/2021 14:16:11**

ref:\_00D60Jpqk.\_5007V1uyAtl:ref

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